

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Circuit Court Judge

Case No. 2009-CP-07-03201

Appellate Case No. 2014-001296

National Bank of South Carolina, ..... Respondent,

v.

Thaddeus F. Segars; KCS Investments, LLC; Singleton  
Place Homeowners Association Inc.; and Suntrust  
Mortgage Inc., ..... Defendants,

Of Whom Thaddeus F. Segars is the, ..... Appellant.

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JAN 14 2015

**SC Court of Appeals**

**MOTION FOR SECOND EXTENSION OF TIME TO FILE RESPONDENT'S  
INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rules 208(a)(2), 209 and 240 of the South Carolina Appellate Court Rules, Respondent National Bank of South Carolina ("NBSC"), requests a thirty (30) day extension of time to file its Initial Brief and Designation of Matter in the above-captioned matter. This is the second request for an extension of this deadline.

This request is necessitated because local counsels' court schedule and other briefing deadlines will not allow them to complete the Respondent's Initial Brief and Designation within the current deadline. Currently, NBSC's Initial Brief and

Designation are due on January 14, 2015. With the additional thirty (30) day extension, NBSC's Initial Brief and Designation will be due on February 13, 2015, per Rule 263, SCACR.

Counsel for Appellant does not object to this extension.

Therefore, NBSC respectfully moves this Court for a thirty (30) day extension of time to file its Initial Brief of Respondent and Designation of Matter in the above-captioned matter until February 13, 2015. NBSC asks that the current deadline be held in abeyance pending the Court's consideration and resolution of this motion.

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Attorneys for Respondent

Charleston, South Carolina  
January 12, 2015

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CERTIFICATE OF SERVICE

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I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Respondent, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

**MOTION FOR SECOND EXTENSION OF TIME TO  
FILE RESPONDENT'S INITIAL BRIEF AND  
DESIGNATION OF MATTER**

Counsel Served:

Thomas J. Finn, Esq.  
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PO Box 6003  
Hilton Head Island, SC 29938



Donna Horn  
Administrative Assistant

January 12, 2015

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# Nelson Mullins

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January 12, 2015

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

RE: National Bank of South Carolina v. Thaddeus F. Segars; KCS Investments, LLC; Singleton Place Homeowners Association, Inc.; and SunTrust Mortgage, Inc., of whom Thaddeus Segars is the Appellant  
Case No.: 2009-CP-07-03201  
Court of Appeals Case No. 2014-01296  
NMRS File No.: 00325/02009

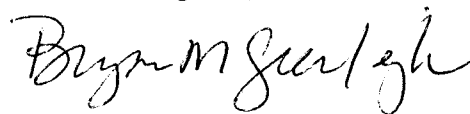
Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Respondent's Motion for Second Extension of Time to File Initial Brief and Designation of Matter in the above-referenced matter. We would ask that you file the original and return a clocked-in copy to us in the envelope provided. Also enclosed is our check in the amount of \$25.00 as the required filing fee.

By copy of this letter, we are serving this Motion on counsel for Appellant Thaddeus Segars, who has no objection to this extension.

Thank you for your assistance.

With kind regards,



Bryson M. Geer

BMG:dh

Enclosures

cc: Thomas J. Finn, Esq. (w/enclosure)

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JAN 14 2015

**SC Court of Appeals**

